UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO

PROMESA Title III

as representative of

Case No. 17 BK 3283-LTS (Jointly Administered)

COMMONTHWEALTH OF PUERTO RICO, et al.,1

Debtors

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO

Case No. 17 BK 4780-LTS

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY.

Debtor.

UNIÓN DE TRABAJADORES DE LA INDUSTRIA ELÉCTRICA Y RIEGO, INC., et al.,

PROMESA Title III

Plaintiffs,

Adv. Pro. No. 21-00041 (LTS)

v.

PEDRO R. PIERLUISI-URRUTIA, et al.,

Defendants.

MOTION TO WITHDRAW AS COUNSEL

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19 BK 5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

COMES NOW The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the sole Title III representative of the Debtors pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA")², and states and requests as follows:

- Attorney Paula A. González Montalvo has resigned from the law firm of O'Neill & Borges LLC.
- 2. The Oversight Board will continue to be represented in the matter of reference by the law firms of Proskauer Rose LLP and O'Neill & Borges LLC.

WHEREFORE, the Oversight Board respectfully requests that the Court take notice of the foregoing and grant attorney Paula A. González Montalvo leave to withdraw as counsel of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this December 30th, 2021.

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties appearing in said system.

s/Paula A. González Montalvo
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² PROMESA is codified at 48 U.S.C. §§ 2101-2241.